

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ELIZABETH MOELLER and
NICOLE
BRISSON, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

AMERICAN MEDIA, INC., a
Delaware corporation, and ODYSSEY
MAGAZINE PUBLISHING GROUP,
INC.,
a Delaware corporation,

Defendants.

Case No. 16-cv-11367

**DECLARATION OF LANA LUCCHESI
RE: NOTICE PROCEDURES**

I, **LANA LUCCHESI**, declare:

1. I am a Senior Project Manager at Kurtzman Carson Consultants LLC ("KCC"). I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. KCC was retained by the parties to serve as the Claims Administrator to, among other tasks, email the Notice of Proposed Class Action Settlement (the "Email Notice"); mail the Notice of Proposed Class Action Settlement Postcard Notice and Claim Form ("the Postcard Notice"); receive and process Claim Forms, respond to Class Member inquiries; to establish and maintain a settlement website and perform other duties as specified in the Class Action Settlement Agreement (the "Settlement

Agreement”) preliminarily approved by this Court on June 8, 2017.

EXPERIENCE

3. KCC is a class action administration firm that provides comprehensive class action services, including legal notification, email and postal mailing campaign implementation, website design, call center support, class member data management, claims processing, check and voucher disbursements, tax reporting, settlement fund escrow and reporting, and other related services critical to the effective administration of class action settlements. KCC has developed efficient, secure and cost-effective methods to properly handle the voluminous data and mailings associated with the noticing, claims processing, and disbursement requirements of settlements to ensure the orderly and fair treatment of class members and all parties of interest.

4. KCC’s business is national in scope. Since 1984, KCC—along with Rosenthal & Company, which was acquired by KCC in 2010, and Gilardi & Co. LLC, which was acquired by KCC in 2015—has been retained to administer more than 6,000 class actions. KCC has provided noticing solutions in cases ranging from 22 to more than 22 million class members and has distributed settlement payments totaling well over two billion dollars in the aggregate.

NOTICE AND ADMINISTRATION SERVICES

5. **CAFA Notification.** In compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. Section 1715, KCC compiled a CD-ROM containing the following documents: Class Action Complaint and Demand for Jury Trial, Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (with Exhibits), [Proposed] Order Granting Preliminary Approval of Class Action Settlement Agreement, Certifying Settlement Class, Appointing Class Representative, Appointing Class Counsel, and Approving Notice Plan, Claim Form, Email Notice, Postcard Notice, Long Form Notice, and Class Action Settlement Agreement, which accompanied a cover letter (collectively, the “CAFA Notice Packet”). A copy of the cover letter is attached hereto as Exhibit A.

6. On April 27, 2017, KCC caused sixty-two (62) CAFA Notice Packets to be mailed via Priority Mail from the U.S. Post Office in Memphis, Tennessee to the parties listed on Exhibit B, *i.e.*, the U.S. Attorney General, the Attorneys General of each of the 50 States and the District of Columbia,

1 the Attorneys General of the 5 recognized U.S. Territories, as well as parties of interest to this Action.

2 7. As of the date of this declaration, KCC has received no response to the CAFA Notice
3 Packet from any of the recipients identified in paragraph 6 above.

4 8. **Emailed Notice and Mailed Notice.** On June 13, 2017, the Defendant provided KCC
5 with a list of 423,237 persons identified as the Class Member List. KCC entered the Class Member List
6 information into its proprietary database and prepared a data file for the initial mailing. Prior to mailing,
7 KCC caused the addresses in the Class Member List to be updated using the National Change of
8 Address database ("NCOA") maintained by the U.S. Postal Service. A total of 38,107 addresses were
9 found and updated

10 9. KCC identified 88,807 duplicative records. KCC removed these duplicative records from
11 the Class Member List, resulting in 334,430 remaining on the Class Member List.

12 10. On June 22, 2017, KCC emailed the Email Notice to each of the 8,871 email addresses
13 on the Class Member List. A sample of the Email Notice is attached hereto as Exhibit C.

14 11. Of the 8,871 Email Notices that were sent, 8,255 were sent successfully and 616 were
15 undeliverable.

16 12. On June 29, 2017, KCC mailed the Postcard Notice to each of the 325,963 persons where
17 an email address was not available or the Email Notice was not delivered successfully and a postal
18 mailing address was available. A sample of the Postcard Notice is attached hereto as Exhibit D.

19 13. As of August 16, 2017, KCC has received a total of 3,752 Postcard Notices returned by
20 the U.S. Postal Service with forwarding addresses. KCC caused the Class Member list to be updated
21 with the new addresses and Postcard Notices to be re-mailed to the updated addresses. As of August 16,
22 2017, KCC has received a total of 33,558 Postcard Notices returned by the U.S. Postal Service without
23 forwarding address information.

24 14. Notice was successfully delivered to 300,660 persons on the Class Member List, or
25 89.9% of the Settlement Class.

26 15. **Interactive Voice Response.** On June 16, 2017, KCC established an Interactive Voice
27 Response (the "IVR") system to provide information about the settlement and to record requests for
28 Notice Packets. As of August 16, 2017, 1,604 calls have been received by the IVR.

16. **Website.** On June 16, 2017, KCC also established a website (www.americanmediamagazinesettlement.com) dedicated to this settlement to provide additional information to the Class Members and to answer frequently asked questions. Visitors of the website can download a Notice, Claim Form, Preliminary Approval Order, Settlement Agreement, and Plaintiffs' Motion for and Brief in Support of Attorneys' Fees, Expenses, and Incentive Award. Visitors can also submit claims online. The web address was set forth in the E-mail Notice, Postcard Notice, and Claim Form. As of August 16, 2017, the website has received 5,018 visits.

17. **Requests for Exclusion.** The deadline for Class Members to request to be excluded from the class was a postmarked deadline of August 14, 2017. As of the date of this declaration, KCC has received five requests for exclusion. A list of the Class Members requesting to be excluded is attached hereto as Exhibit E.

18. **Objections to the Settlement.** The deadline for Class Members to object to the Settlement was a postmarked deadline of August 14, 2017. As of the date of this declaration, KCC has not received any objections to the settlement.

19. **Claim Forms**. The deadline for Class Members to file a claim is a postmarked deadline of October 21, 2017. As of the date of this declaration, KCC has received 39,280 claim forms. KCC will continue the process of evaluating claim forms received and will continue to do so over the next few months. These numbers are subject to change as KCC continues our review of claims and since the filing deadline has not yet passed. In addition, these 39,280 claims have yet to be validated or screened for duplicates.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct to the best of my knowledge. Executed on this 23rd day of August 2017 at San Rafael, California.

Quarantini

Lana Lucchesi

Exhibit A



3301 Kerner Boulevard
San Rafael, CA 94901

415.798.5900 PHONE
415.892.7354 FAX
kccllc.com

April 27, 2017

VIA PRIORITY MAIL

«First» «Last»
«Company»
«Address_1»
«Address_2»
«City», «State» «Zip»

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear «First» «Last»:

KCC CLASS ACTION SERVICES, LLC has been retained as the independent third-party administrator in a putative class action lawsuit entitled *Elizabeth Moeller and Nicole Brisson, individually and on behalf of all others similarly situated, v. American Media, Inc., a Delaware corporation, and Odyssey Magazine Publishing Group, Inc., a Delaware corporation*, Case No. 5:16-cv-11367-JEL-EAS. ZwillGen, PLLC represents American Media, Inc. and Odyssey Magazine Publishing Group, Inc. (“Defendants”) in that matter. The lawsuit is pending before the Honorable Judith E. Levy in the United States District Court for the Eastern District of Michigan. This letter is to advise you that Plaintiffs filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit on April 18, 2017.

Case Name: *Elizabeth Moeller, et al., v. American Media, Inc., et al.*

Case Number: 5:16-cv-11367-JEL-EAS

Jurisdiction: United States District Court,
Eastern District of Michigan

Date Settlement

Filed with Court: April 18, 2017

Defendants deny any wrongdoing or liability whatsoever, but have decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:



«First» «Last»

April 27, 2017

Page 2

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** A copy of the *Class Action Complaint and Demand for Jury Trial* is included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** As of April 27, 2017, the Court has not yet scheduled a final fairness hearing in this matter. Plaintiffs filed *Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement* (with Exhibits) requesting that a hearing take place before the Honorable Judith E. Levy. Copies of *Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement* (with Exhibits) and *[Proposed] Order Granting Preliminary Approval of Class Action Settlement Agreement, Certifying Settlement Class, Appointing Class Representative, Appointing Class Counsel, and Approving Notice Plan* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Claim Form, Email Notice, Postcard Notice, and Long Form Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** A copy of the *Class Action Settlement Agreement* is included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of April 27, 2017, no other settlement or agreement has been entered into by the parties to this Action, either directly or by and through their respective counsels.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of April 27, 2017, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** While Defendants are in the process of gathering information on this issue, pursuant to 28 U.S.C. § 1715(b)(7)(A), at this time a complete list of names of class members as well as each State of residence is not available, because the parties do not presently know the names or current addresses of all the proposed settlement class members and will not learn this information until the Settlement is preliminarily approved and the Court authorizes dissemination of information about the Settlement through the Class Notice. Pursuant to 28 U.S.C. § 1715(b)(7)(B), it is estimated that there are approximately 415,000 individuals in the class.
8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of April 27, 2017, there has been no written judicial opinion related to the settlement.



«First» «Last»

April 27, 2017

Page 3

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact KCC immediately at (415) 798-5969 so that Defendants have opportunity to address any concerns or questions you may have.

Thank you.

Sincerely,

/s/

Daniel Burke
Executive Vice President

Enclosure – CD

Exhibit B

Last	First	Company	Address 1	Address 2	City	State	Zip
Lindemuth	Jahna	Office of the Alaska Attorney General	P.O. Box 110300		Juneau	AK	99811-0300
Marshall	Steve	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
Rutledge	Leslie	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
Brnovich	Mark	Office of the Arizona Attorney General	1275 W. Washington Street		Phoenix	AZ	85007
CAFA Coordinator		Office of the Attorney General	Consumer Law Section	455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
Coffman	Cynthia	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor	Denver	CO	80203
Jepsen	George	State of Connecticut Attorney General's Office	55 Elm Street		Hartford	CT	6106
Racine	Karl A.	District of Columbia Attorney General	441 4th Street, NW, Suite 1100S		Washington	DC	20001
Sessions	Jefferson	Attorney General of the United States	United States Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Denn	Matthew	Delaware Attorney General	Carvel State Office Building	820 N. French Street	Wilmington	DE	19801
Bondi	Pam	Office of the Attorney General of Florida	The Capitol, PL-01		Tallahassee	FL	32399-1050
Carr	Chris	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Chin	Douglas S.	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
Miller	Tom	Iowa Attorney General	Hoover State Office Building	1305 E. Walnut Street	Des Moines	IA	50319
Wasden	Lawrence	State of Idaho Attorney General's Office	Statehouse	700 W Jefferson St	Boise	ID	83720-0010
Madigan	Lisa	Illinois Attorney General	James R. Thompson Center	100 W. Randolph Street	Chicago	IL	60601
Hill, Jr.	Curtis T.	Indiana Attorney General's Office	Indiana Government Center South	302 West Washington Street, 5th Floor	Indianapolis	IN	46204
Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor		Topeka	KS	66612-1597
Beshear	Andy	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
Landry	Jeff	Office of the Louisiana Attorney General	P.O. Box 94095		Baton Rouge	LA	70804-4095
Healey	Maura	Office of the Attorney General of Massachusetts	1 Ashburton Place		Boston	MA	02108-1518
Frosh	Brian	Office of the Maryland Attorney General	200 St. Paul Place		Baltimore	MD	21202-2202
Mills	Janet	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
Schuette	Bill	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
Lori Swanson	Attorney General	Attention: CAFA Coordinator	1400 Bremer Tower	445 Minnesota Street	St. Paul	MN	55101-2131
Hawley	Joshua D.	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
Hood	Jim	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39205
Fox	Tim	Office of the Montana Attorney General	Justice Bldg.	215 N. Sanders Street	Helena	MT	59620-1401
Stein	Josh	Office of the North Carolina Attorney General	Department of Justice	P.O. Box 629	Raleigh	NC	27602-0629
Stenehjem	Wayne	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Avenue	Bismarck	ND	58505-0040
Peterson	Doug	Office of the Nebraska Attorney General	State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
Foster	Joseph A.	New Hampshire Attorney General	State House Annex	33 Capitol Street	Concord	NH	03301-6397
Porino	Christopher S.	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market Street, P.O. Box 080	Trenton	NJ	08625
Balderas	Hector	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
Laxalt	Adam Paul	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson Street	Carson City	NV	89701
Schneiderman	Eric	Office of the New York Attorney General	Department of Law	The Capitol, 2nd Floor	Albany	NY	12224
DeWine	Mike	Ohio Attorney General	State Office Tower	30 E. Broad Street	Columbus	OH	43266-0410
Hunter	Mike	Oklahoma Office of the Attorney General	313 NE 21st Street		Oklahoma City	OK	73105
Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court Street, NE	Salem	OR	97301
Shapiro	Josh	Pennsylvania Office of the Attorney General	1600 Strawberry Square		Harrisburg	PA	17120
Kilmartin	Peter	Rhode Island Office of the Attorney General	150 South Main Street		Providence	RI	02903
Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211-1549
Jackley	Marty J.	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
Slatery, III	Herbert H.	Tennessee Attorney General and Reporter	425 5th Avenue North		Nashville	TN	37243
Paxton	Ken	Attorney General of Texas	Capitol Station	P.O. Box 12548	Austin	TX	78711-2548
Reyes	Sean	Utah Office of the Attorney General	State Capitol, Room 236	350 N State St	Salt Lake City	UT	84114-0810
Herring	Mark	Office of the Virginia Attorney General	900 East Main Street		Richmond	VA	23219
Donovan	TJ	Office of the Attorney General of Vermont	109 State Street		Montpelier	VT	05609-1001
Ferguson	Bob	Washington State Office of the Attorney General	1125 Washington St SE	P.O. Box 40100	Olympia	WA	98504-0100
Schimel	Brad	Office of the Wisconsin Attorney General	Dept of Justice, State Capitol, RM 114	East P.O. Box 7857	Madison	WI	53707-7857
Morrissey	Patrick	West Virginia Attorney General	State Capitol	1900 Kanawha Blvd E	Charleston	WV	25305
Michael	Peter K.	Office of the Wyoming Attorney General	State Capitol Bldg.	200 W 24th St	Cheyenne	WY	82002
Ale	Talauaga Eleasalo V.	American Samoa Attorney General	Exec. Ofc. Bldg, Utulei	Territory of American Samoa	Pago Pago	AS	96799
Barrett-Anderson	Elizabeth	Attorney General Office	590 S. Marine Corps Drive	ITC Bldg, Suite 706	Tamuning	Guam	96913
Manibusan	Edward	Northern Mariana Islands Attorney General	Administration Building	PO Box 10007	Saipan	MP	96950-8907
Vazquez Garced	Wanda	Puerto Rico Attorney General	P.O. Box 902192	San Juan	San Juan	PR	00902
Walker	Claude E.	Department of Justice	Virgin Islands Attorney General	34-38 Kronprindsens Gade, GERS Bldg, 2nd Floor	St. Thomas	VI	00802
Balabanian	Rafey	Edelson PC	123 Townsend Street		San Francisco	CA	94107
Rapp	Eve-Lynn	Edelson PC	350 North LaSalle Street	Suite 1300	Chicago	IL	60654
Fraietta	Philip L.	Bursor & Fisher, P.A.	888 Seventh Avenue		New York	NY	10019
Scharg	Henry M.	Law Office of Henry M. Scharg	718 Ford Building		Detroit	MI	48226
Sommer	Jacob	ZwillGen PLLC	1900 M Street NW	Suite 250	Washington	DC	20036

Exhibit C

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT*Moeller et al. v. American Media Inc. et al.*, Case No. 2:16-cv-11367-JEL-EAS**(United States District Court for the Eastern District of Michigan)****Our Records Indicate You Have Subscribed to an American Media Inc.
and / or Odyssey Magazine Publishing Group Inc. Magazine and
are Entitled to a Payment From a Class Action Settlement.**

This notice is to inform you that a settlement has been reached in a class action lawsuit claiming that Defendants, magazine publishers American Media Inc. and Odyssey Magazine Publishing Group Inc. (“AMI”), disclosed its customers’ subscription information to third parties in violation of Michigan privacy law. The Defendants deny they violated any law, but have agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

Am I a Class Member? Our records indicate you may be a Class Member. Class Members are approximately 415,000 persons with Michigan street addresses who between April 14, 2010 and July 31, 2016 obtained a subscription to an AMI Publication, including Country Weekly, Men’s Fitness, Muscle & Fitness, Fit Pregnancy, Flex, Muscle & Fitness Hers, Natural Health, National Examiner, Shape, Star, OK!, Radar, Soap Opera Digest, National Enquirer, and Globe.

What Can I Get? If approved by the Court, Defendants will establish a Settlement Fund of \$7,600,000 paid over two years to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses, attorneys’ fees and costs, and an incentive award. If you are entitled to relief, you may submit a claim to receive a *pro rata* share of the Settlement Fund, estimated at \$100 per class member. The Settlement also requires Defendants to not disclose their Michigan customers’ subscription information to third-party companies without the prior express written consent of the affected subscribers for a four-year period.

How Do I Get a Payment? You must submit a timely and complete Claim Form postmarked or submitted on-line **no later than October 21, 2017**. You can file a claim by clicking [here](#). Your payment will come by check in two installments.

What are My Other Options? You may exclude yourself from the Class by sending a letter to the Settlement Administrator postmarked no later than **August 14, 2017**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. You and/or your lawyer have the right to appear before the Court and/or object to the proposed Settlement. Your written objection must be filed no later than **August 14, 2017**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.americanmediamagazinesettlement.com. If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court’s orders and judgments. In addition, your claims relating to the alleged disclosure of subscriber information in this case against the Defendants will be released.

Who Represents Me? The Court has appointed lawyers Jay Edelson of Edelson PC and Scott A. Bursor of Bursor & Fisher, P.A to represent the class. These attorneys are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at 10:00 a.m. on September 6, 2017 at the Federal Building, Room 100, 200 East Liberty Street, Ann Arbor,

Michigan. At that hearing, the Court will: hear any objections concerning the fairness of the Settlement; determine the fairness of the Settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award each of the two Class Representatives \$5,000 from the Settlement Fund for their services in helping to bring and settle this case. Defendants have agreed to pay Class Counsel reasonable attorneys' fees in an amount to be determined by the Court. Class Counsel is entitled to seek no more than 35% of the Settlement Fund, but the Court may award less than this amount.

How Do I Get More Information? For more information, including the full Notice, Claim Form and Settlement Agreement go to www.americanmediamagazinesettlement.com, contact the Settlement Administrator at 1-844-363-2454 or Magazine Subscriber Privacy Settlement Administrator, P.O. Box 43494, Providence, RI 02940-9827, or call Class Counsel at 1-866-354-3015.

Exhibit D

**COURT AUTHORIZED NOTICE
OF CLASS ACTION AND
PROPOSED SETTLEMENT**

Magazine Subscriber Privacy
Settlement Administrator
P.O. Box 43494
Providence, RI 02940-9827

OUR RECORDS INDICATE
YOU HAVE SUBSCRIBED
TO AN AMERICAN MEDIA INC.
AND/OR ODYSSEY MAGAZINE
PUBLISHING GROUP INC.
MAGAZINE AND ARE ENTITLED
TO A PAYMENT FROM A
CLASS ACTION SETTLEMENT.

«Barcode»

Postal Service: Please do not mark barcode

Claim#: ADA-«ClaimID»-«MailRec»

«First1» «Last1»

«CO»

«Addr2»

«Addr1»

«City», «St» «Zip»

«Country»

ADA

ADACRD1

Carefully separate at perforation.

Claim ID: «ClaimID»

MAGAZINE SUBSCRIBER PRIVACY SETTLEMENT CLAIM FORM

THIS CLAIM FORM MUST BE POSTMARKED BY OCTOBER 21, 2017 AND MUST BE FULLY
COMPLETED, BE SIGNED, AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

Instructions: Fill out each section of this form and sign where indicated.

Full Name: _____

Street Address: _____

City, State, ZIP: _____

Email Address (optional): _____

Contact Phone #: _____ (You may be contacted if further information is required.)

Class Member Verification: By submitting this Claim Form and filling in the circles below, I declare that I believe I am a member of the Settlement Class and that the following statements are true (each circle must be filled in to receive a payment):

☐ I had a Michigan street address and obtained a subscription to an American Media Inc. Publication between April 14, 2010 and July 31, 2016. American Media Inc. Publications include: Country Weekly, Men's Fitness, Muscle & Fitness, Fit Pregnancy, Flex, Muscle & Fitness Hers, Natural Health, National Examiner, Shape, Star, OK!, Radar, Soap Opera Digest, National Enquirer, and Globe.

☐ Under penalty of perjury, all information provided in this Claim Form is true and correct to the best of my knowledge and belief.

Signature: _____ Date (mm/dd/yyyy): _____

Print Name: _____

The Settlement Administrator will review your Claim Form; if accepted you will be mailed a check for a *pro rata* share depending on the number of valid Claim Forms received. This process takes time, please be patient.

Questions, visit www.americanmediamagazinesettlement.com or call 1-844-363-2454



«ClaimID»

ADA

settlement has been reached in a Class Action lawsuit involving the Defendants, including the publishers American Family Publishing Group Inc. ("AFPI"), disclosed their customers' subscription information to third parties in violation of Michigan privacy law. The Defendants deny they violated any law, but has agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

Am I a Class Member? Our records indicate you may be a Class Member. Class Members are approximately 415,000 persons with Michigan street addresses who between April 14, 2010 and July 31, 2016 obtained a subscription to an AMI Magazine including Country Weekly, Men's Fitness, Muscle & Fitness, Fit Pregnancy, Flex, Muscle & Fitness Hers, Natural Health, National Examiner, Shape, Star, OK!, Radar, Soap Opera Digest, National Enquirer, and Globe.

What Can I Get? If approved by the Court, Defendants will establish a Settlement Fund of \$7,600,000 paid over two years to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses, attorneys' fees and costs, and an incentive award. If you are entitled to relief, you may submit a claim to receive a *pro rata* share of the Settlement Fund, estimated at \$100 per Class Member. The Settlement also requires Defendants to not disclose their Michigan customers' subscription information to third-party companies without the prior express written consent of the affected subscribers for a four-year period.

How Do I Get a Payment? You must submit a timely and complete Claim Form postmarked or submitted on-line **no later than October 21, 2017**. A Claim Form is attached to this Notice or you can file on-line at www.americanmediamagazinesettlement.com. Your payment will come after Defendants make the final installment payment.

What are My Other Options? You may exclude yourself from the Class by sending a letter to the Settlement Administrator postmarked no later than **August 14, 2017**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. You and/or your lawyer have the right to appear before the Court and/or object to the proposed Settlement. Your written objection must be filed no later than **August 14, 2017**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.americanmediamagazinesettlement.com. If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims relating to the alleged disclosure of subscriber information in this case against the Defendants will be released.

Who Represents Me? The Court has appointed lawyers Jay Edelson of Edelson PC and Scott A. Bursor of Bursor & Fisher, P.A to represent the class. These attorneys are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

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How Do I Get More Information? For more information, including the full Notice, Claim Form and Settlement Agreement, go to www.americanmediamagazinesettlement.com, contact the Settlement Administrator at 1-844-363-2454 or Magazine Subscriber Privacy Settlement Administrator, P.O. Box 43494, Providence, RI 02940-9827, or call Class Counsel at 1-866-354-3015.

ADA



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



POSTAGE WILL BE PAID BY ADDRESSEE

MAGAZINE SUBSCRIBER PRIVACY SETTLEMENT ADMINISTRATOR
P.O. BOX 43494
PROVIDENCE RI 02940-9827



Exhibit E

KCC Class Action Services
Moeller v. American Media, Inc.
Exclusion Report

Count

5

ClaimID	Last Name	First Name
10031453301	BRACHULIS	KATHERINE
10117256401	HAGERMAN	KATHY
10185327001	MANNING	REX
10232968001	PIPHER	JEANNE
10300173601	TRECHA	R J